

JULIA JAYNE (State Bar No. 202753)  
ASHLEY RISER (State Bar No. 320538)  
JAYNE LAW GROUP, P.C.  
803 Hearst Ave.  
Berkeley, Ca 94710  
Telephone: (415) 623-3600  
Email: *ashley@jaynelawgroup.com*

Attorney for Defendant  
SANDRA LE

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
SANDRA LE,  
  
Defendant.

Case No. CR 21-00331 WHO [SK]

**SANDRA LE'S EX PARTE  
APPLICATION FOR ORDER  
PERMITTING MODIFICATION TO  
TRAVEL RESTRICTIONS; [PROPOSED]  
ORDER**

I, Ashley Riser, declare:

1. I represent Defendant Sandra Le in the above-entitled matter. She is currently on pretrial release with an unsecured \$50,000 bond, drug testing and treatment conditions, and travel restricted to the Northern District of California. The purpose of this application is to respectfully request that Ms. Le's pretrial conditions are modified to allow for her to travel to the Eastern District of California in order to regularly visit and provide caretaking to her sister with cancer.
2. Ms. Le will continue to attend any drug testing, counseling, or other conditions or requirements ordered by Pretrial Services.
3. Defense counsel contacted Pretrial Services regarding this request and Officer

EX PARTE APPLICATION; [PROPOSED] ORDER  
CASE NO. CR 21-00331 WHO [SK]

Pepper Friesen does not object to this request. Further, defense counsel provided Officer Friesen all pertinent contact information for Ms. Le's sister.

4. Assistant United States Attorney Kenneth Chambers II does not object to this request.

5. Based on the foregoing, I respectfully request that the conditions of Ms. Le's release be modified to allow for her to travel to the Eastern District of California. All other conditions of release shall remain the same.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: January 10, 2022

By: \_\_\_\_\_ /s/  
Ashley Riser  
Counsel for SANDRA LE

**[PROPOSED] ORDER**

Based on the foregoing, and good cause appearing:

**IT IS HEREBY ORDERED** that the conditions of Defendant Sandra Le's release shall be modified as follows:

Ms. Le's travel is restricted to the Northern and Eastern Districts of California. All other terms and conditions shall remain in place.

DATED: \_\_\_\_\_

HON. SALLIE KIM  
United States Magistrate Judge